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AUSNET GAS SERVICES PTY
LTD

**REVIEW OF PART 10
FINANCIAL REPORTING
2024-25**

HISTORICAL DEMAND
INFORMATION

wsp

DECEMBER 2025

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Review of Part 10 Financial Reporting 2024-25 Historical Demand Information

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REV	DATE	DETAILS
A	8 December 2025	Draft report
B	10 December 2025	Final report

	NAME	DATE	SIGNATURE
Prepared by:	D Downing	10 December 2025	
Reviewed by:	N Symons B Jensen	10 December 2025	
Approved by:	D Downing	10 December 2025	

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Independent Assurance Statement

WSP Australia Pty Limited (WSP) was engaged by AusNet Gas Services Pty Ltd (AusNet Gas) to review the Part 10 historical demand non-financial information contained in the Part 10 Financial Reporting Template and Basis of Preparation workbooks prepared for submission in December 2025. The Guidelines require AusNet Gas to submit the information for the 12 months between 1 July 2024 and 30 June 2025.

AUSNET GAS'S RESPONSIBILITY

AusNet Gas's responsibility in relation to the submission of Part 10 historical demand non-financial information is to:

- prepare the Basis of Preparation in accordance with the Guidelines and Handbook.
- prepare and report the non-financial information in accordance with the Guidelines and Handbook and in accordance with its Basis of Preparation

WSP'S RESPONSIBILITY

Our responsibility is to assess whether the non-financial information has been presented fairly in all material respects in accordance with the requirements of the Guidelines and Handbook, and AusNet Gas's Basis of Preparation.

Whilst the Guidelines are silent as to the qualifications of the class of person providing assurance of non-financial historical demand information, WSP is qualified to provide such a service according to qualifications that are normally required by the AER, such as those specified in Appendix C, Clause 2.2 of the Annual Gas RIN. Accordingly, WSP was engaged by AusNet Gas to undertake a review of the Part 10 historical demand non-financial information for 2024-25. This report has been prepared in accordance with the requirements outlined in the Guidelines.

The review was undertaken as a limited assurance engagement in accordance with ASAE 3000 *Assurance Engagements Other than Audits or Reviews of Historical Financial Information*, as required by the Guidelines. In conducting this review, the Reviewer performed procedures to obtain evidence about the information. The procedures used depended on the Reviewer's judgment, including the identification of the risks of material misstatement at the disclosure level, whether due to fraud or error. The Reviewer considered internal controls, system controls relating to the preparation and fair presentation of any estimates and disclosures made in the submission in order to design review procedures that are appropriate in the circumstances. Additional review procedures were used to obtain further evidence where the Reviewer believed that the information may be materially misstated.

The procedures performed in a limited assurance engagement vary in nature and timing from, and are less than, those performed in a reasonable assurance engagement. Consequently, the level of assurance obtained in a limited assurance engagement can be substantially lower than the assurance that would have been obtained had a reasonable assurance engagement been performed.

INDEPENDENCE AND ETHICS

We have complied with the independence and other ethical requirements relating to assurance engagements through adherence to WSP's values and our Code of Conduct.

CONCLUSION

Based on the procedures performed and evidence obtained, nothing has come to the Reviewer's attention that causes it to suggest that the non-financial information does not, in all material respects, present fairly the historical demand of the pipeline, in accordance with the requirements of the Guidelines and Handbook and AusNet Gas's Basis of Preparation.

Yours sincerely,



David Downing

Principal, Advisory
WSP Australia Pty Limited

In preparing this report, WSP has relied upon documents, data, reports and other information provided by third parties including, but not exclusively, jurisdictional regulators as referred to in the report. Except as otherwise stated in the report, WSP has not verified the accuracy or completeness of the information. To the extent that the statements, opinions, facts, information, conclusions and/or recommendations in this report are based in whole or part on the information, those conclusions are contingent upon the accuracy and completeness of the information provided. WSP will not be liable in relation to incorrect conclusions should any information be incorrect or have been concealed, withheld, misrepresented or otherwise not fully disclosed to WSP. The assessment and conclusions are indicative of the situation at the time of preparing the report. Within the limitations imposed by the scope of services and the assessment of the data, the preparation of this report has been undertaken and performed in a professional manner, in accordance with generally accepted practices and using a degree of skill and care ordinarily exercised by reputable consultants under similar circumstances. No other warranty, expressed or implied, is made.



TABLE OF CONTENTS

	INDEPENDENT ASSURANCE STATEMENT	III
	ABBREVIATIONS	II
1	INTRODUCTION	1
1.1	Scope of review	1
1.2	Our approach	1
2	INFORMATION SOURCES	3
2.1	Data sources - information systems	3
2.2	Information provided for review	3
3	OUR FINDINGS.....	5
3.1	Table 5.1: Historical demand information.....	5
3.2	Table 5.2: Demand by pipeline service	5
3.3	Table 5.3: Daily demand.....	7

Abbreviations

AEMO	Australian Energy Market Operator
AER	Australian Energy Regulator
DTS	Declared Transmission System
HRS	Haulage Reference Service
MDQ	Maximum Daily Quantity
MIBB	Market Information Bulletin Board
MIRN	Meter Installation Reference Number
MJ	megajoule
MJ/Sm ³	megajoule per standard metre cubed
NGR	National Gas Rules
NSP	Network Service Provider
SME	Subject Matter Expert

1 Introduction

In Part 10 of the National Gas Rules (NGR), rule 101A, subrule (1)(c) requires “... a service provider to prepare, publish and maintain, financial information, historical demand information and a cost allocation methodology in accordance with rule 101D”. Rule 101D requires “a service provider for a pipeline [to] prepare and publish on its website: (a) financial information and historical demand information for each of its pipelines, which must: (i) be in the form and contain the information specified in the pipeline information disclosure guidelines; and (ii) be certified in the manner provided for in the pipeline information disclosure guidelines ...”.

Rule 103 requires the AER to “... publish and maintain pipeline information disclosure guidelines ... [which] must: (a) provide for the publication of financial and historical demand information about each pipeline on a pipeline by pipeline basis ... in respect of the financial year of the service provider for the pipeline ...”

The AER published the required guidelines as the “Pipeline information disclosure guidelines and Price reporting guidelines for Part 18A facilities” (the “Guidelines”) with an accompanying “Handbook: Part 10 financial reporting template and Basis of Preparation template” (the “Handbook”) on 27 October 2023. Together, the Guidelines and the Handbook set out the principles and requirements for gas distribution service providers’ information disclosures in compliance with Part 10 of the NGR.

Sections 6.2, 6.3, and Appendix D of the Guidelines impose assurance obligations on service providers which, for historical demand information, require them to obtain ‘limited assurance’ in accordance with ASAE 3000 *Assurance Engagements Other than Audits or Reviews of Historical Financial Information*. The Guidelines are silent as to the qualifications of the assurance practitioner providing assurance of non-financial historical demand information. However, WSP is qualified to provide such a service according to the qualifications that are normally required by the AER, such as those specified in Appendix C, Clause 2.2 of the Annual Gas RIN. Accordingly, WSP was engaged by AusNet Gas to undertake a review of the Part 10 historical demand non-financial information for 2024-25.

The deadline for service providers to publish the required information is set out in the table in Rule 101A, subrule (2). Financial and historical demand information and the cost allocation methodology should be published “annually no later than 5 months after the end of the financial year of the service provider for the pipeline, subject to the qualification that the information does not need to be provided before the application date for the pipeline”.

1.1 Scope of review

WSP undertook the review of the Part 10 historical demand non-financial information for the 12 months between 1 July 2024 and 30 June 2025 contained in the templates workbook entitled *Gas Part 10 Financial Reporting Template (Consolidated)*, in accordance with the relevant parts of the Guidelines. The review was undertaken as a limited assurance engagement as required by the Guidelines in accordance with ASAE 3000 *Assurance Engagements Other than Audits or Reviews of Historical Financial Information*. This included:

- 1 A review of the Basis of Preparation document required to be prepared under the Guidelines and the Handbook.
- 2 A review of historical non-financial information in worksheet 5. Historical Demand of the template workbook.
- 3 Providing a conclusion as to whether anything has come to the Reviewer’s attention that causes it to suggest that the non-financial information is not, in all material respects, present fairly the historical demand of the pipeline.

1.2 Our approach

To achieve the outcome required by the RIN, WSP undertook this review as follows:

- receiving the Basis of Preparation and proposed information submission from AusNet Gas

- receiving supporting documentation, data and calculations from AusNet Gas
- assessing whether definitions in the Basis of Preparation aligned with the definitions set out in the Guidelines
- assessing whether the sources of information and methodologies described in the Basis of Preparation aligned with the instructions set out in the Guidelines
- examining the Microsoft Excel spreadsheet templates for inconsistencies in data and/or trends, and whether those inconsistencies reflected the methodologies set out in the Basis of Preparation
- if necessary, clarification with key staff of the findings of the desktop review to determine if the information was produced in accordance with requirements of the Guidelines
- clarification of any non-financial information that was estimated and the methodologies and assumptions used to estimate it
- limited sampling of source data to confirm that the non-financial information is consistent with information held in those systems.

WSP's review approach and subsequent report comply with the review requirements outlined in Sections 6.2, 6.3, and Appendix D of the Guidelines and with the requirements of ASAE 3000 *Assurance Engagements Other than Audits or Reviews of Historical Financial Information* for a limited assurance engagement.

2 Information sources

AusNet Gas uses several business systems and planning reports as a basis for gathering information and converting it into the format required by the Guidelines. During the review, WSP identified the following information systems and documentation that were relied upon by AusNet Gas.

The scope of the review did not include reviewing the systems and procedures, so accordingly WSP undertook the review on the assumption that the information contained in these systems was fit for purpose and the review concentrated on the use of correct definitions, the assumptions and the estimates used to close information gaps. Our reviewers also sought to ascertain, where possible within the constraints of the review process, whether the source information was the most appropriate information to use to derive the information to populate the RIN tables.

2.1 Data sources - information systems

Table 2.1 Information systems relevant to this review

AUSNET GAS INFORMATION SYSTEM	FUNCTION
EAI	Enterprise Application Integration gateway for transferring market data
Hansen	Meter and meter data management system
Kinetiq	Gas customer billing system
MV-RS	Meter reading software for data collection and route management for handheld units
SDMG	Spatial Data Management Gas – geographical information system storing spatial asset data

2.2 Information provided for review

Note: document and file names in the following tables are reproduced verbatim according to the information received.

Table 2.2 Submission information provided for review

TEMPLATE TYPE	FILE NAMES	DATE
Initial and final submission		
Part 10 Financial Reporting Template	Gas Part 10 Financial Reporting Template (Consolidated).xlsx	31 October 2025
Basis of Preparation	Gas Part 10 - Basis of Preparation Template..xlsx	31 October 2025

Table 2.3 Supporting information provided for review

TABLE NUMBER	FILE NAMES	DATE RECEIVED
All Tables	Gas Part 10 - Workings.xlsx MA-036_Gas_Pipe_Length_Report.xls	31 October 2025

TABLE NUMBER	FILE NAMES	DATE RECEIVED
Table 5.2	AER Proposed Template Category Mapping for AusNet Tariffs.msg (email AER to AusNet Gas et al dated 20 May 2025, Subject: Reporting distribution pipeline services in the Part 10 financial template [SEC=OFFICIAL] [ACCC-ACCCANDAER.FID3755068])	31 October 2025
	AusNet Gas Services 2024-25 - Annual - RIN Response (WSP 10.11.2025).xlsx (Table N1.2 Demand by Tariff)	10 November 2025
Table 5.3	Daily Demand Support (Danielle J).msg (Internal email dated 27 October 2025, Subject: RE: Gas RIN 2025 Reporting - Support Request)	31 October 2025
	Nameplate Capacities.xlsx	31 October 2025
	Consumption by Date.xlsx – generated from Kinetiq source data using Python/Jupyter notebook, “Consumption by Date.ipynb”	31 October 2025

3 Our findings

This section describes the layout of each table and the information required by the Guidelines. We detail the issues we found and whether we consider them to be material. Where known, we also describe how AusNet Gas rectified any issues identified.

The methodology used to assess the data is described in section 1.2 and the information sources and documents we reviewed are described in section 2.

3.1 Table 5.1: Historical demand information

BASIS OF PREPARATION ID	DESCRIPTION OF THE INFORMATION	PUBLICLY AVAILABLE LINK ON GAS BULLETIN BOARD

KEY REQUIREMENTS FOR THIS TABLE:

- 1 For information required to be published on the Gas Bulletin Board, Service Providers may provide a publicly available link on their website to the relevant part of the Gas Bulletin Board.

REVIEW FINDINGS

- 1 AusNet Gas's Basis of Preparation states that this table is not applicable (N/A) to its reporting, and made a 'null' (blank) response in the table.
- 2 The Reviewer examined the Gas Bulletin Board and AusNet Gas's website to determine whether there was information published that might be linked, and found none. Therefore, the Reviewer is satisfied that AusNet Gas's 'null' response is appropriate.
- 3 The Reviewer did not find reason to believe that the Basis of Preparation for Table 5.1 has not been prepared in accordance with the requirements of the Guidelines and Handbook.
- 4 The Reviewer did not find reason to suggest that the non-financial information contained in Table 5.1 has not been presented fairly in all material respects in accordance with the Basis of Preparation and the requirements of the Guidelines and Handbook.

3.2 Table 5.2: Demand by pipeline service

	CONTRACTED MDQ TJ/DAY
Firm forward haul transportation service	TJ/day
Backhaul service	TJ/day
Interruptible or as available transportation service	TJ/day

	CONTRACTED MDQ TJ/DAY
Firm stand-alone compression service	TJ/day
Interruptible or as available stand-alone compression service	TJ/day
Park service	TJ/day
Park and loan services	TJ/day
Capacity trading service	TJ/day
In pipe trading service	TJ/day
Other	TJ/day

KEY REQUIREMENTS FOR THIS TABLE:

- 1 Service Provider must report the daily average utilised capacity by pipeline service
- 2 Service Providers must describe the methodology used to collect and aggregate historical demand data, including how volumes were metered or estimated and any adjustments to the raw data.
- 3 AER provided clarification on the cross-referencing/mapping to be applied to AusNet Gas's measured gas volumes recorded by tariff to convert them to the pipeline service categorisations being reported in Table 5.2, as follows:

Tariff V (domestic)	Firm forward haul transportation service
Tariff V (non-domestic)	Backhaul service
Tariff M	Firm stand-alone compression service
Tariff D	Interruptible or as available stand-alone compression service
Ancillary	Other

REVIEW FINDINGS:

- 1 AusNet Gas based its reported volumes on those previously reported in Table N1.2 Demand by Tariff of its annual RIN submission for 2024-25, recategorised to the Part 10 pipeline service categorisations according to the advice provided by the AER. The Reviewer concurs with this approach and finds that the reported volumes are wholly consistent with those reported in response to the RIN. Given that the gas volumes reported in the RIN submission were previously subjected to limited assurance review in accordance with ASAE 3000, the Reviewer finds that the volumes reported in Table 5.2 also satisfy the limited assurance standard.
- 2 The Reviewer did not find reason to believe that the Basis of Preparation for Table 5.2 has not been prepared in accordance with the requirements of the Guidelines and Handbook.
- 3 The Reviewer did not find reason to suggest that the non-financial information in Table 5.2 has not been presented fairly in all material respects in accordance with the Basis of Preparation and the requirements of the Guidelines and Handbook.

3.3 Table 5.3: Daily demand

	CONTRACTED FIRM CAPACITY-TRANSPORTATION	CONTRACTED FIRM CAPACITY-STORAGE	UTILISED CAPACITY	PIPELINE NAMEPLATE CAPACITY	AVAILABLE CAPACITY-TOTAL	AVAILABLE CAPACITY-FIRM	AVAILABLE CONTRACTED CAPACITY
Total	Totals calculated by workbook						
1/07/20xx	TJ/day	TJ/day	TJ/day	TJ/day	Calculated by workbook		
2/07/20xx	TJ/day	TJ/day	TJ/day	TJ/day			
	TJ/day	TJ/day	TJ/day	TJ/day			
	TJ/day	TJ/day	TJ/day	TJ/day			
29/06/20yy	TJ/day	TJ/day	TJ/day	TJ/day			
30/06/20yy	TJ/day	TJ/day	TJ/day	TJ/day			

KEY REQUIREMENTS FOR THIS TABLE:

- 1 AusNet Gas must report daily demand information on a daily basis. Data is to be completed for the four columns 2-5, Contracted Firm Capacity-Transportation, Contracted Firm Capacity-Storage, Utilised Capacity, and Pipeline Nameplate Capacity.
- 2 Data entries for the date (column 1), annual totals (row 1), and the three columns 6-8, Available capacity-total, Available capacity-firm, and Available contracted capacity are automatically completed by coding built into the workbook template.

REVIEW FINDINGS

- 1 AusNet Gas’s Basis of Preparation states that it has neither Contracted Firm Capacity-Transportation nor Contracted Firm Capacity-Storage capacities to report. The Reviewer found no evidence to dispute this claim, and therefore concurs with AusNet’s reporting of zero for each of these categorisations.
- 2 AusNet Gas determined the reported Pipeline Name Plate Capacity as the daily aggregate capacity of each city gate and each injection point to the inner metropolitan transmission network. AusNet Gas has assumed 24-hour availability at each location and a gas heating value of 38.6 MJ/Sm³ when calculating the daily pipeline nameplate capacity. The Reviewer noted the comment by the SME providing the pipeline capacity information in the email ‘Daily Demand Support (Danielle J).msg’ that, “... these numbers do inadvertently take into account flow through our transmission pipelines as well as our distribution networks ...”.

The Reviewer reviewed the supporting information file provided (Nameplate Capacities.xlsx), and noted that in addition to the 43 ‘city gates’ listed (injection points to the gas distribution network from the gas transmission network) there were another four gates listed that are identified in Section 4.3 of the Transmission Pipeline Strategy, AMS 30-50, submitted with AusNet Gas’s current Access Arrangement revised proposal as “injection points into the inner metropolitan transmission network”. The Reviewer was therefore concerned that there might be a risk that pipeline capacity information had been overstated, and asked AusNet Gas to clarify whether the capacities of the additional four injection points should be wholly or partially excluded from the reported pipeline capacities.

- 3 AusNet Gas clarified that from a regulatory perspective, the 'inner metropolitan transmission network' forms part of its regulated gas distribution network, and all capacities and offtakes into this network should be included in its gas distribution information disclosures. The Reviewer accepted this clarification and is satisfied that the daily pipeline capacities have therefore been reported in conformance with the requirements of the Guidelines.
- 4 All issues were resolved to the satisfaction of the Reviewer.
- 5 The Reviewer did not find reason to believe that the Basis of Preparation for Table 5.3 has not been prepared in accordance with the requirements of the Guidelines and Handbook.
- 6 The Reviewer did not find reason to suggest that the non-financial information presented in the Table 5.3 has not been presented fairly in all material respects in accordance with the Basis of Preparation and the requirements of the Guidelines and Handbook.

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